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*Attorneys for Defendants Amir Shalev
& AS Enterprises, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATE OF AMERICA,)	
)	CASE NO. 2:21-cv-00184-JCM-DJA
Plaintiff,)	
)	UNOPPOSED MOTION TO EXTEND
vs.)	TIME FOR DEFENDANTS SHALEV
)	AND AS ENTERPRISES, INC. TO
PCPLV, LLC, et al,)	RESPOND TO THE SUMMONS AND
)	COMPLAINT
Defendants.)	
		(FIRST REQUEST)

COME NOW the defendants AMIR SHALEV and AS ENTERPRISES, INC., by and through their counsel, Lisa A. Rasmussen, Esq., of The Law Offices of Kristina Wildeveld & Associates, and hereby move this Court pursuant to LR IA 6-1 for an order authorizing them to respond to Plaintiff's Complaint on or before January 27, 2024. This Motion is made and based on the following:

1. A summons and complaint were served on Mr. Shalev and AS Enterprises, Inc. in late October, 2023.
2. Mr. Shalev just retained the undersigned to represent him and it appears an answer is due soon, though the exact date is not clear.
3. Mr. Shalev had prior counsel who worked with him in attempting to negotiate this matter with the government and as a result, the government held off for a substantial period

1 of time on serving the complaint. His prior counsel has moved to a new job and can no longer
 2 represent him. The undersigned is working on getting materials from prior counsel to determine
 3 where the conversations on resolution left off.

4 4. The undersigned would like an opportunity to discuss possible resolution with
 5 the government prior to expending time and expense on litigation if a resolution can be had.

6 5. The government has permitted an extension of time to other defendants in this
 7 matter until January 27, 2024 and is willing to permit the same extension to Mr. Shalev and his
 8 entity, AS Enterprises, Inc.

9 6. This is defendants' first motion for extension of time to respond to the complaint.
 10 Based on the foregoing, defendants respectfully request an order authorizing them to
 11 respond to Plaintiff's Complaint on or before January 27, 2024.

12 Respectfully submitted this 16th day of November, 2023.

13 **The Law Offices of Kristina Wildeveld & Associates,**

14 */s/ Lisa A. Rasmussen*

15 LISA A. RASMUSSEN, ESQ.

16 Nevada Bar No. 7491

*Counsel for Defendants Amir Shalev
& AS Enterprises, Inc.*

17 **IT IS ORDERED** that Defendants' Amir Shalev and AS Enterprises, Inc.'s unopposed
 18 motion for extension of time to respond to the complaint (ECF No. 36) is **GRANTED**
 19 **IN PART and DENIED IN PART.** It is granted in part regarding Defendants' request
 20 for an extension. It is denied in part regarding Defendants' request for the extension to
 21 be until January 27, 2024, which is a Saturday.

22 **IT IS FURTHER ORDERED** that Defendants Amir Shalev and AS Enterprises, Inc.
 23 must respond to Plaintiff's complaint on or before **January 26, 2024.**

24 
 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

DATED: November 17, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of November, 2023, I served a copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS SHALEV AND AS ENTERPRISES, INC. TO RESPOND TO THE SUMMONS AND COMPLAINT (FIRST REQUEST)**, via CM/ECF, as required by this Court's local rules, upon the following person(s) and all other persons registered to receive CM/ECF service in this case:

Summer Johnson, AUSA

/s/ Lisa A Rasmussen

An employee of The Law Offices of Kristina Wildeveld & Associates